

Your response

Please refer to the sub-questions or prompts in the [annex](#) to our call for evidence.

Question	Your response
<p>Question 1: Please provide a description introducing your organisation, service or interest in Online Safety.</p>	<p><i>Is this response confidential? – N</i></p> <p>Since inception in 2004, Indeed has put the job seeker experience at the heart of every decision we make. With 250 million unique visitors per month globally, and more than 60 million UK visitors each month, allowing job seekers to search millions of jobs in more than 60 countries and 28 languages. Globally, over three million employers use Indeed to find and hire new employees and in the UK, more than 320,000 companies hire people using Indeed.</p> <p>Indeed utilizes a number of products and services in order to best serve our users. Fundamentally, for job seekers, our platform is free to use. We strive to help all job seekers get jobs, by providing access to all job listings on our platform without fees. As well, we offer free content related to successful job search practices, industry-specific information, hiring events for job seekers, and other relevant job seeker information which is constantly updated through our Indeed Career Guide. For employers, we offer free content on how to improve their practices, as well as a number of paid services, including Indeed Hiring Platform, Sponsored Jobs, Indeed Resume, Indeed Apply, Indeed Featured Employer Program, and Hiring Events.</p> <p>With every decision we make, we ask ourselves, “What’s best for the job seeker?” in service of making it faster, easier and more enjoyable for people to get a job. Our job seeker-first mentality ultimately benefits employers, as well, by getting the right people in the right jobs, quickly.</p>

Question 2: Can you provide any evidence relating to the presence or quantity of illegal content on user-to-user and search services?

IMPORTANT: Under this question, we are not seeking links to or copies/screenshots of content that is illegal to hold, such as child sexual abuse. Deliberately viewing such images may be a criminal offence and will be reported to the police.

Is this response confidential? – N

We greatly value the trust that our job seeker and employer users place in us during critical stages of their career development and business growth. Indeed takes a [multi-layered approach](#) to protecting both our users and our platform from potential threats, through a series of policies, rules filters, technology tools, partnerships and solutions, and human review. We develop and deploy new policies and practices regularly, in order to appropriately adapt to new threats and regulation. Through our policies and actions across our company, including security, trust & safety, data privacy, and legal, Indeed's strives to make our platform a safe and secure place for all users. Twice a year, we release the [Indeed Transparency Report](#), which highlights the ways in which we protect the privacy and safety of our job seekers and employers.

Security

As Indeed's first layer of defense from potential threats, the Security team works closely with Indeed's Product teams to protect job seekers and employers on our site in many ways, including by blocking potentially malicious traffic from bots and occasionally human fraudsters. As well, seven years ago Indeed launched both public and private [bug bounty programs](#), to identify potential vulnerabilities to our platform, by crowdsourcing assistance from third-party researchers.

Trust & Safety

As Indeed's second line of defense, the Trust & Safety team strives to protect job seekers and employers from outstanding instances of fraud and quality violations by automatically and manually identifying and removing fraudulent accounts and low-

	<p>quality job postings. The majority of the accounts removed are done so proactively, through Indeed's own detection, and done so within a few days, or removed prior to receiving applications.</p> <p>Between July 1 - December 31, 2021, Indeed globally removed 293,505 accounts due to quality violation. Indeed defines quality violations as accounts or job postings that may go against our policies and or guidelines. During that same period, Indeed removed 292,027 accounts due to fraud. Indeed defines fraud as accounts or job postings that target job seekers or employers with malicious actions or law-breaking activities.</p> <p><u>Data Privacy and Legal Compliance</u> Indeed takes privacy very seriously – we operate through privacy by design and privacy by default in order to maintain the integrity of our platform and the trust that our users place in us to help them find the right jobs and candidates. Our Privacy team responsibly seeks to protect job seekers and employers by facilitating Data Subject Right (DSR) requests and processing government and private party requests.</p> <p>In compliance with privacy laws like the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA), we respond to requests from users regarding their personal data. These Data Subject Right requests typically fall into one of two categories: Access Requests and Deletion Requests.</p>
<p>Question 3: How do you currently assess the risk of harm to individuals in the UK from illegal content presented by your service?</p>	<p><i>Is this response confidential? – N</i></p> <p>Content evaluation by Indeed allows for our series of defensive and protective measures to deploy in order to protect the information of users, as well as protect our users against potential harms or threats.</p> <p>Indeed seeks to strike a balance between allowing appropriate and legal content to be posted on its platform, while ensuring</p>

	<p>the safety of our users, as well as protecting their privacy and information.</p> <p>Through our internal reporting systems and content management review, escalations allow for multiple individuals and teams to review some actions.</p> <p>We also deploy an appeals process for our users to initiate if they disagree with content moderation decisions that have been made by Indeed. This allows for an opportunity to further scrutinize given previous content moderation actions, in order to ensure protection of users, while also seeking to facilitate appropriate job seekers and employer efforts.</p> <p>The Site is not for use by anyone under the age of 16. However, if local laws provide for an alternative minimum age for Indeed to lawfully provide the services in the Site to users, then that shall apply as the applicable minimum age. In all jurisdictions outside the European Union, if users are under the age of 18 or the age of majority in your jurisdiction, users must use Indeed under the supervision of a parent, legal guardian or responsible adult. Indeed adopts a range of measures to try to ensure that we do not accept individuals who do not meet the minimum age and any other applicable age requirements.</p>
<p>Question 4: What are your governance, accountability and decision-making structures for user and platform safety?</p>	<p><i>Is this response confidential? – N</i></p> <p>Indeed’s content moderation principles seek to prevent any illegal content, exploitation of information, prevent harassment, discrimination or offensive content, and prevent against unfair business practices, among many other areas – enforced globally.</p> <p>Increasingly, Indeed’s efforts to protect its users are updated, especially in relation to protecting the safety of users beyond just word format content. We seek to ensure that user generated content on our platform is both appropriate and relevant for</p>

our users. Indeed seeks to remove bad content from our platform as quickly as possible, to protect our users and retain the credibility of our platform.

Each job listing on Indeed contains a “Report Job” flagging tool, where users can report to Indeed if they believe a given job posting is in violation of Indeed’s [Terms of Service](#). The reporting tool contains a pre-loaded category of offense: “It is offensive, discriminatory;” “It seems like a fake job;” “It is inaccurate;” “It is an advertisement;” “Other;” as well as an open field where a user can submit additional information or justification for their reporting of a job. Within Indeed’s [Support page](#), we offer further explanation of the type of jobs to report:

- **Offensive or Discriminatory:** Jobs that appear to discriminate based on gender, age, race, religion, disability, or any other characteristic may be reported with this option. Additionally, you may report jobs that have inappropriate or explicit content.
- **Fake:** Seems suspicious, might be asking for personal information or can’t find online.
- **Spam:** Not an actual job, may be selling a service or unpaid
- **Discriminatory or offensive:** Used biased or inappropriate language
- **Expired or not available:** Old or no longer hiring
- **Technical Issue:** Can’t apply due to an error or broken link
- **Incomplete or incorrect information:** Details like location are missing or wrong
- **Report Concerns of illicit activity:** Report concerns of illicit activity
- **Other:** It’s something else
- **Additional information (optional)**

<p>Question 5: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements?</p>	<p><i>Is this response confidential? – N</i></p> <p>Indeed firmly believes that proper communication of our terms and policies is important for the safe and proper use of our platform by our users. As well, we seek to provide additional guidance and education, to further benefit the safety of our users. We publish a series of important educational tips and guidelines in our Help Center to help our users safely and effectively use our platform, including</p> <ul style="list-style-type: none"> • Guidelines for Safe Job Search • I May Have Been Scammed, What Can I Do? • How to Contact Indeed for Additional Support and Help • How to Identify Scam Job Titles on Indeed • How to Verify Suspicious Correspondence from an Employers • How to Report a Conversation to Indeed • Reporting a Job • Accessibility Accommodations
<p>Question 6: How do your terms of service or public policy statements treat illegal content? How are these terms of service maintained and how much resource is dedicated to this?</p>	<p><i>Is this response confidential? – N</i></p>
<p>Question 7: What can providers of online services do to enhance the transparency, accessibility, ease of use and users' awareness of their reporting and complaints mechanisms?</p>	<p><i>Is this response confidential? – N</i></p>
<p>Question 8: If your service has <i>reporting or flagging</i> mechanisms in place for illegal content, or users who post illegal content, how are these processes designed and maintained?</p>	<p><i>Is this response confidential? – N</i></p> <p>As indicated in question 4, Indeed reporting function allows any user to follow complaint processes to flag potential violations to Indeed's terms of service. As threats against humanity and individuals continue to evolve, Indeed is constantly reviewing its practices to seek to address new concerns to the safety and security of our users. In addition to the categories of content we seek to remove from our platform, we also</p>

	<p>have established internal reporting processes for special high-risk categories of content - including the potential exploitation of children and human trafficking.</p>
<p>Question 9: If your service has a <i>complaints</i> mechanism in place, how are these processes designed and maintained?</p>	<p><i>Is this response confidential? – N</i></p> <p>Please see response to question 4 above.</p>
<p>Question 10: What action does your service take in response to <i>reports</i> or <i>complaints</i>?</p>	<p><i>Is this response confidential? – N</i></p> <p>Please see response to question 2 above.</p>
<p>Question 11: Could improvements be made to content moderation to deliver greater protection for users, without unduly restricting user activity? If so, what?</p>	<p><i>Is this response confidential? – N</i></p>
<p>Question 12: What automated moderation systems do you have in place around illegal content?</p>	<p><i>Is this response confidential? – N</i></p> <p>Indeed uses automatic and manual means of identifying and removing fraudulent accounts from our site as quickly as possible. We put rules in place to flag potentially risky accounts for review by our moderators, and our Trust & Safety team proactively uses various tools and subject matter expertise to manually identify any accounts that the automatic system may miss.</p> <p>Through these automatic and manual means of identifying fraudulent accounts, Indeed is able to minimize their impact on our users, especially job seekers who do not then put themselves at risk by engaging with fraudulent employers.</p>
<p>Question 13: How do you use human moderators to identify and assess illegal content?</p>	<p><i>Is this response confidential? – N</i></p> <p>Indeed protection of user' safety blends both human and technology tools. We deploy varying moderation escalation processes, depending on the complexity and risk of a given potential infringement against our terms. Our human moderation process involves both internal and third-</p>

	<p>party vendors, which operate under the same Indeed standard of user safety through training and approved processes. Combining our internal moderators capabilities with that of third-parties allows us 24/7 platform coverage. Our blend of moderation allows our technology tools to be utilized, and supplemented through utilization and oversight by human moderators.</p>
<p>Question 14: How are sanctions or restrictions around access (including to both the service and to particular content) applied by providers of online services?</p>	<p><i>Is this response confidential? – N</i></p>
<p>Question 15: In what instances is illegal content removed from your service?</p>	<p><i>Is this response confidential? – N</i></p> <p>Please see response to question 2 above.</p>
<p>Question 16: Do you use other tools to reduce the visibility and impact of illegal content?</p>	<p><i>Is this response confidential? – N</i></p> <p>Indeed removes fraudulent and bad quality content through a variety of mechanisms. Intentionally, we do not provide excess visibility to our tools and internal mechanisms externally, as to not provide greater insight into our practices to fraudsters.</p>
<p>Question 17: What other sanctions or disincentives do you employ against users who post illegal content?</p>	<p><i>Is this response confidential? – N</i></p> <p>When Indeed determines that content should be actioned against, we remove the content as quickly as possible. Depending on the circumstances we work to suspend accounts, most notably with fraudulent actions, and we work through technology and human efforts to identify potentially linked accounts, to remove fraudulent content providers entirely. When content is removed, we deploy a series of communications and measures to inform the user of the action taken against them.</p>
<p>Question 18: Are there any functionalities or design features which evidence suggests can effectively prevent harm, and could or should be deployed more widely by industry?</p>	<p><i>Is this response confidential? – N</i></p>

<p>Question 19: To what extent does your service encompass functionalities or features designed to mitigate the risk or impact of harm from illegal content?</p>	<p><i>Is this response confidential? – N</i></p> <p>We seek to integrate trust and safety, and security measures throughout the development and deployment of all of our products and services. We have a number of specialized and trained teams dedicated to various efforts within the entire user safety process, as well specific trust and safety issue areas and measures. As well, we deploy a number of filters which seek to limit the type of content that is displayed to each user.</p>
<p>Question 20: How do you support the safety and wellbeing of your users as regards illegal content?</p>	<p><i>Is this response confidential? – N</i></p> <p>Please see response to question 4 above.</p>
<p>Question 21: How do you mitigate any risks posed by the design of algorithms that support the function of your service (e.g. search engines, or social and content recommender systems), with reference to illegal content specifically?</p>	<p><i>Is this response confidential? – N</i></p>
<p>Question 22: What age assurance and age verification technologies are available to platforms, and what is the impact and cost of using them?</p>	<p><i>Is this response confidential? – N</i></p>
<p>Question 23: Can you identify factors which might indicate that a service is likely to attract child users?</p>	<p><i>Is this response confidential? – N</i></p>
<p>Question 24: Does your service use any age assurance or age verification tools or related technologies to verify or estimate the age of users?</p>	<p><i>Is this response confidential? – N</i></p>
<p>Question 25: If it is not possible for children to access your service, or a part of it, how do you ensure this?</p>	<p><i>Is this response confidential? – N</i></p>
<p>Question 26: What information do you have about the age of your users?</p>	<p><i>Is this response confidential? – N</i></p>

Question 27: For purposes of transparency, what type of information is useful/not useful? Why?

Is this response confidential? – N

Question 28: Other than those in this document, are you aware of other measures available for mitigating risk and harm from illegal content?

Is this response confidential? – N

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